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<p>1 Confidential - █████ Fuller</p> <p>2 please?</p> <p>3 Q. After the hitting in the living</p> <p>4 room, did you walk to the other room?</p> <p>5 A. I don't know.</p> <p>6 Q. You don't recall how you got in?</p> <p>7 A. No.</p> <p>8 Q. Okay. Do you recall, was Miss</p> <p>9 █████ also tied up -- withdrawn. Let me ask</p> <p>10 it --</p> <p>11 Going back to the second room that</p> <p>12 you were in, the three of you, you testified</p> <p>13 that your feet and arms were tied.</p> <p>14 Do you recall that?</p> <p>15 A. No.</p> <p>16 Q. Were your feet tied in the other</p> <p>17 room?</p> <p>18 A. I don't really recall.</p> <p>19 Q. Okay.</p> <p>20 A. I know when I was in that room my</p> <p>21 feet and hands were tied.</p> <p>22 Q. Okay. That's what I was asking.</p> <p>23 Okay.</p> <p>24 And when your feet and hands were</p> <p>25 tied, was Miss █████ tied in any way?</p>	<p>1 Confidential - █████ Fuller</p> <p>2 Q. Sexually assaulted, you say, with an</p> <p>3 instrument. █████?</p> <p>4 A. I don't recall the exact nature.</p> <p>5 Q. Can you describe the instrument?</p> <p>6 A. I cannot at this time.</p> <p>7 Q. When you say █████, was</p> <p>8 the █████?</p> <p>9 A. Yes.</p> <p>10 Q. Were any other instruments used on</p> <p>11 your body at that time?</p> <p>12 A. I can't recall.</p> <p>13 Q. Was the instrument used any place</p> <p>14 █████?</p> <p>15 A. I don't think so.</p> <p>16 Q. Did you -- you said you wanted the</p> <p>17 activity to stop and then there came a time</p> <p>18 that it did stop, correct?</p> <p>19 A. Yes.</p> <p>20 Q. Did you say, Stop this, stop this,</p> <p>21 or words to that effect?</p> <p>22 A. No. There was a verbiage I was</p> <p>23 using. I don't recall the exact verbiage at</p> <p>24 this time.</p> <p>25 Q. Okay.</p>
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<p>1 Confidential - █████ Fuller</p> <p>2 A. I don't recall.</p> <p>3 Q. Do you recall anything that Miss</p> <p>4 █████ said at that time?</p> <p>5 A. No.</p> <p>6 Q. Do you recall anything that</p> <p>7 Mr. Rubin said at that time?</p> <p>8 A. No.</p> <p>9 Q. After your feet and arms were tied</p> <p>10 in the second room, what happened next?</p> <p>11 A. I remember feeling pain. I remember</p> <p>12 wanting this activity to stop. I remember the</p> <p>13 activity stopping after asking several times</p> <p>14 for it to stop. I remember going out to the</p> <p>15 living room and Miss █████ remained in the</p> <p>16 room with Mr. Rubin.</p> <p>17 Q. You said you felt pain. Was that</p> <p>18 from being tied up?</p> <p>19 A. I don't recall exactly what I was</p> <p>20 feeling pain from. I am sure it was a</p> <p>21 multitude of things.</p> <p>22 Q. What else was happening to you after</p> <p>23 you were tied up?</p> <p>24 A. I was s █████</p> <p>25 █████. I don't know.</p>	<p>1 Confidential - █████ Fuller</p> <p>2 A. But I remember there was an exact</p> <p>3 verbiage. There was no "stop." I remember I</p> <p>4 wasn't able to use certain words at certain</p> <p>5 times. I was unable to say certain words at</p> <p>6 certain times, yes.</p> <p>7 Q. I am sorry. You said a certain</p> <p>8 verbiage. Do you mean there was a safe word</p> <p>9 you were supposed to use?</p> <p>10 A. I guess with my knowledge now,</p> <p>11 that's what you would call it.</p> <p>12 Q. Okay. So a word to use in order to</p> <p>13 stop --</p> <p>14 A. Yes.</p> <p>15 Q. -- if you wanted the activity to</p> <p>16 stop.</p> <p>17 How had you learned that, what I'll</p> <p>18 call a safe word?</p> <p>19 A. I remember that was being told to me</p> <p>20 before all this had started.</p> <p>21 Q. Who told you that?</p> <p>22 A. Mr. Rubin.</p> <p>23 Q. What did he say about that?</p> <p>24 A. I can't really recall exact verbiage</p> <p>25 what was said about it. I remember knowing a</p>

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<p>1 Confidential - █████ Fuller</p> <p>2 word. I remember being a little confused</p> <p>3 about the word. I remember using the word</p> <p>4 several times.</p> <p>5 Q. So do I understand that before</p> <p>6 Mr. Rubin hit you, he told you, we are going</p> <p>7 to have a safe word, and he told you what the</p> <p>8 safe word was?</p> <p>9 A. Yes. And I wasn't exactly clear of</p> <p>10 a safe word, but yes. I knew there was a word</p> <p>11 that I would be using.</p> <p>12 Q. I am using the word "safe word,"</p> <p>13 because I think you said that's what you --</p> <p>14 now you understand that?</p> <p>15 A. Exactly.</p> <p>16 Q. To be referred to as a safe word?</p> <p>17 A. Exactly.</p> <p>18 Q. You don't remember what the safe</p> <p>19 word was, is that correct?</p> <p>20 A. Not at this time.</p> <p>21 Q. When Mr. Rubin █████</p> <p>22 █████, did you</p> <p>23 use the safe word?</p> <p>24 A. I don't recall.</p> <p>25 Q. You don't recall, okay. Do you</p>	<p>1 Confidential - █████ Fuller</p> <p>2 us were you blindfolded?</p> <p>3 A. I am sorry, can you repeat the</p> <p>4 question?</p> <p>5 Q. Sure. Let me ask a better question.</p> <p>6 When in the sequence of events that you have</p> <p>7 described for us, were you blindfolded?</p> <p>8 A. I don't recall.</p> <p>9 Q. And when was it in the sequence of</p> <p>10 events that you have described did you remove</p> <p>11 the blindfold?</p> <p>12 A. I don't believe I removed the</p> <p>13 blindfold.</p> <p>14 Q. Okay. When, in the sequence of</p> <p>15 events that you have described for us, was the</p> <p>16 blindfold removed?</p> <p>17 A. Yes.</p> <p>18 Q. When?</p> <p>19 A. I don't recall.</p> <p>20 Q. Was your mouth gagged at any time?</p> <p>21 A. Yes.</p> <p>22 Q. What was it gagged with?</p> <p>23 A. I don't recall.</p> <p>24 Q. It was gagged with some kind of</p> <p>25 device, I take it?</p>
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<p>1 Confidential - █████ Fuller</p> <p>2 recall what happened -- what happened that led</p> <p>3 you to use the safe word?</p> <p>4 A. There are times that I remember</p> <p>5 these things. At this current moment, I</p> <p>6 cannot. It's a little pressing to have my</p> <p>7 memory right now of exact events, the exact</p> <p>8 moment, the exact time, but I do remember I</p> <p>9 had used the word a couple times.</p> <p>10 Q. But you don't remember what it was</p> <p>11 that you used the word about that caused you</p> <p>12 to use the word, is that right?</p> <p>13 A. No.</p> <p>14 Q. Were you blindfolded?</p> <p>15 A. At one point I believe I was, yes.</p> <p>16 Q. And then was the blindfold removed?</p> <p>17 A. I don't remember.</p> <p>18 Q. Well, you said at one point you were</p> <p>19 blindfolded, so how was it that --</p> <p>20 A. Apparently it was removed.</p> <p>21 Q. When were you blindfolded?</p> <p>22 A. I believe I was already in the room,</p> <p>23 the second room.</p> <p>24 Q. The second room? When in the</p> <p>25 context of events that you have described for</p>	<p>1 Confidential - █████ Fuller</p> <p>2 A. Yes.</p> <p>3 Q. Were you able to remove the device?</p> <p>4 A. No.</p> <p>5 Q. The complaint in this action states</p> <p>6 at paragraph 234, "At one point Fuller was</p> <p>7 able to remove the gag from her mouth for long</p> <p>8 enough to say the safe word."</p> <p>9 Does that refresh your recollection</p> <p>10 that you were in fact able to remove the gag?</p> <p>11 A. Kind of, but I don't think I was the</p> <p>12 one that was able to remove the gag. I think</p> <p>13 it was done. I don't know exactly how to</p> <p>14 answer that question.</p> <p>15 Q. Were you able to make noises even</p> <p>16 though the gag was in your mouth?</p> <p>17 A. Yes.</p> <p>18 Q. And you were able to utter words</p> <p>19 although they weren't clear, isn't that right?</p> <p>20 A. Maybe.</p> <p>21 Q. Ma'am, I don't know how to say</p> <p>22 "maybe." Do you recall that, or do you know</p> <p>23 that you were or were not, or you don't know?</p> <p>24 A. I don't know.</p> <p>25 Q. Isn't it correct that even with the</p>

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<p>1 Confidential - █████ Fuller</p> <p>2 █████, you were</p> <p>3 indeed able to utter the safe word?</p> <p>4 A. I am kind of confused on how you are</p> <p>5 asking me that question.</p> <p>6 Q. Let me ask it again. Even when the</p> <p>7 gag was in your mouth, is it not correct that</p> <p>8 you were able to use the safe word?</p> <p>9 A. I was able to make sounds.</p> <p>10 Q. And one of the sounds was you could</p> <p>11 make the sounds of the safe word, correct?</p> <p>12 A. I can't recall.</p> <p>13 Q. During the time that Mr. Rubin was</p> <p>14 █████, what</p> <p>15 was Miss █████ doing?</p> <p>16 A. I can't recall. I don't know.</p> <p>17 Q. There came a time that you used the</p> <p>18 safe word and Mr. Rubin stopped, correct?</p> <p>19 A. Can you rephrase that question,</p> <p>20 please?</p> <p>21 Q. There came a time that you used the</p> <p>22 safe word and Mr. Rubin stopped, correct?</p> <p>23 MR. GROSSMAN: Objection. You said</p> <p>24 the same question when she asked you to</p> <p>25 rephrase it, but if you understand it,</p>	<p>1 Confidential - █████ Fuller</p> <p>2 A. Yes.</p> <p>3 Q. You didn't use the phone at that</p> <p>4 time to call anyone, did you?</p> <p>5 A. I can't recall. I definitely didn't</p> <p>6 call anybody after that, no.</p> <p>7 Q. And you remained in the living room,</p> <p>8 correct?</p> <p>9 A. Yes.</p> <p>10 Q. How long did you remain in the</p> <p>11 living room until -- there came a time that</p> <p>12 Mr. Rubin and Miss █████ came out of the</p> <p>13 second room, correct?</p> <p>14 A. (Nodding affirmatively).</p> <p>15 Q. Correct?</p> <p>16 A. (Nodding affirmatively).</p> <p>17 Q. And how long was that?</p> <p>18 A. I can't recall. I can't recall the</p> <p>19 exact time. I don't think I had a reference</p> <p>20 of time at that moment.</p> <p>21 Q. Is there anything that you could</p> <p>22 look at that would tell you about how long</p> <p>23 that went?</p> <p>24 A. No.</p> <p>25 Q. There is nothing you can think of as</p>
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<p>1 Confidential - █████ Fuller</p> <p>2 you can answer.</p> <p>3 A. Can you please rephrase the</p> <p>4 question?</p> <p>5 MR. ROSENBERG: Sure.</p> <p>6 BY MR. ROSENBERG:</p> <p>7 Q. How did you come to leave the room?</p> <p>8 A. I remember after using the safe</p> <p>9 word, I was unbound and I was able to freely</p> <p>10 walk out.</p> <p>11 Q. And when you walked out, what did</p> <p>12 you do?</p> <p>13 A. I remember crying and being upset.</p> <p>14 I remember the door closing and Miss █████</p> <p>15 and Mr. Rubin remained in the room. I believe</p> <p>16 I smoked a cigarette. I believe I was</p> <p>17 drinking some more. I know I was upset.</p> <p>18 Q. Did you have your phone with you at</p> <p>19 that time?</p> <p>20 A. Probably. I don't recall.</p> <p>21 Q. But probably -- you said "probably."</p> <p>22 Is that because usually, like most people, you</p> <p>23 had your phone with you or nearby?</p> <p>24 A. Yes.</p> <p>25 Q. Isn't that right?</p>	<p>1 Confidential - █████ Fuller</p> <p>2 you sit here today that would refresh your</p> <p>3 memory?</p> <p>4 A. No.</p> <p>5 Q. And when they came out of the room,</p> <p>6 were you dressed at that time?</p> <p>7 A. No.</p> <p>8 Q. You had remained naked?</p> <p>9 A. I don't recall.</p> <p>10 Q. You don't recall, okay?</p> <p>11 What happened when they came out of</p> <p>12 the room?</p> <p>13 A. I remember Mr. Rubin coming and</p> <p>14 saying some things to me and having a back and</p> <p>15 forth conversation. The exact details I don't</p> <p>16 remember. And I remember Mr. Rubin leaving.</p> <p>17 Q. How long was your conversation with</p> <p>18 Mr. Rubin?</p> <p>19 A. I don't recall.</p> <p>20 Q. Was Miss █████ with you during the</p> <p>21 conversation?</p> <p>22 A. I don't recall where she was.</p> <p>23 Q. She didn't leave the apartment,</p> <p>24 though, did she?</p> <p>25 A. No.</p>

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<p>1 Confidential - █████ Fuller</p> <p>2 Q. You said you don't recall the</p> <p>3 details of the conversation.</p> <p>4 Do you remember anything about the</p> <p>5 conversation you had with Mr. Rubin after he</p> <p>6 came out of the second room with Miss █████</p> <p>7 A. I am sorry, can you repeat the</p> <p>8 question?</p> <p>9 Q. Sure. You said you don't recall the</p> <p>10 details of the conversation. Do you remember</p> <p>11 anything about the conversation you had with</p> <p>12 Mr. Rubin after he came out of the second room</p> <p>13 with Miss █████</p> <p>14 A. I am sorry. I completely don't</p> <p>15 understand the question right now.</p> <p>16 Q. Tell me everything you can remember</p> <p>17 about your conversation with Mr. Rubin before</p> <p>18 he left the apartment?</p> <p>19 A. I cannot exactly remember the nature</p> <p>20 of the conversation. I remember I was just</p> <p>21 upset and I guess I was probably looking maybe</p> <p>22 to be consoled a little bit, but I can't</p> <p>23 exactly tell you the exact nature of the</p> <p>24 conversation, but I need a break soon.</p> <p>25 Q. Let me get to the end of something.</p>	<p>1 Confidential - █████ Fuller</p> <p>2 █████</p> <p>3 █████</p> <p>4 █████</p> <p>5 █████</p> <p>6 █████</p> <p>7 █████</p> <p>8 █████</p> <p>9 █████</p> <p>10 █████</p> <p>11 █████</p> <p>12 █████</p> <p>13 █████</p> <p>14 █████</p> <p>15 █████</p> <p>16 █████</p> <p>17 █████</p> <p>18 █████</p> <p>19 █████</p> <p>20 █████</p> <p>21 █████</p> <p>22 █████</p> <p>23 █████</p> <p>24 █████</p> <p>25 █████</p>
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<p>1 Confidential - █████ Fuller</p> <p>2 It will be very soon, okay?</p> <p>3 A. Okay.</p> <p>4 Q. You said you were probably looking</p> <p>5 maybe to be consoled a little bit. I take it</p> <p>6 Mr. Rubin did not console you, is that fair to</p> <p>7 say?</p> <p>8 A. Not effectively, no.</p> <p>9 Q. He did not effectively console you,</p> <p>10 correct?</p> <p>11 A. I was -- I remember being upset</p> <p>12 continuously throughout that night.</p> <p>13 Q. But you don't remember anything that</p> <p>14 he said to you at that time, correct?</p> <p>15 A. No.</p> <p>16 MR. ROSENBERG: Let's take a break</p> <p>17 here.</p> <p>18 THE VIDEOGRAPHER: Off the record at</p> <p>19 13:04.</p> <p>20 (Lunch recess: 1:04 p.m.)</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 Confidential - █████ Fuller</p> <p>2 Q. And where did you go when you left?</p> <p>3 A. I think I stopped somewhere to eat,</p> <p>4 and then I went to the airport. I don't</p> <p>5 recall which airport.</p> <p>6 Q. And where did you fly to?</p> <p>7 A. Florida.</p> <p>8 Q. When you left did you leave on your</p> <p>9 own?</p> <p>10 A. Yes, I think so.</p> <p>11 Q. How did you get to the airport?</p> <p>12 A. I think an Uber maybe. Maybe I took</p> <p>13 a train. I can't recall.</p> <p>14 Q. But in either case, you went on your</p> <p>15 own. You made your own arrangements to get</p> <p>16 there, is that right?</p> <p>17 A. I think so, yes.</p> <p>18 Q. Were you injured by your encounter</p> <p>19 with Mr. Rubin?</p> <p>20 A. I don't recall exactly.</p> <p>21 Q. Well, let me change -- did you</p> <p>22 discuss with anyone your encounter with</p> <p>23 Mr. Rubin?</p> <p>24 MR. GROSSMAN: I caution the witness</p> <p>25 not to reveal anything she has discussed</p>

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<p>1 Confidential - █████ Fuller</p> <p>2 with her attorneys, but other than that</p> <p>3 you can of course answer.</p> <p>4 A. I'm not exactly sure exactly who I</p> <p>5 have discussed things with.</p> <p>6 BY MR. ROSENBERG:</p> <p>7 Q. Do you discuss with anyone your</p> <p>8 encounter with Mr. Rubin, other than your</p> <p>9 counsel?</p> <p>10 A. I think so, yes.</p> <p>11 Q. With whom?</p> <p>12 A. I can't recall.</p> <p>13 Q. Can you give me any idea of who the</p> <p>14 persons might be with whom you spoke about it?</p> <p>15 A. I can't recall at this time.</p> <p>16 Q. Do you recall what you said?</p> <p>17 A. No.</p> <p>18 Q. When you were in Mr. Rubin's</p> <p>19 apartment, did you call for any medical</p> <p>20 attention?</p> <p>21 A. No.</p> <p>22 Q. Did you call the police or to get</p> <p>23 help in any other way?</p> <p>24 A. No.</p> <p>25 Q. After you left Mr. Rubin's</p>	<p>1 Confidential - █████ Fuller</p> <p>2 suffered injuries to your legs.</p> <p>3 Do you recall that?</p> <p>4 A. Unspecifically.</p> <p>5 Q. I am sorry?</p> <p>6 A. Unspecifically.</p> <p>7 Q. What does that mean?</p> <p>8 A. I am not exact --</p> <p>9 Q. What does unspecifically mean in</p> <p>10 this context?</p> <p>11 A. I am not exactly sure at this time</p> <p>12 exactly what.</p> <p>13 Q. Is there anything you could look at</p> <p>14 that would assist your memory to recall what,</p> <p>15 if any, injuries you suffered?</p> <p>16 A. Perhaps.</p> <p>17 Q. And what would that be?</p> <p>18 A. Photographs or exactly what I said.</p> <p>19 I don't remember everything.</p> <p>20 Q. Were there any photographs?</p> <p>21 A. I don't remember if I took</p> <p>22 photographs or not. I do know that there were</p> <p>23 -- I did have pictures shortly after that</p> <p>24 time. I don't know in what nature they were.</p> <p>25 I don't remember.</p>
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<p>1 Confidential - █████ Fuller</p> <p>2 apartment, did you ever call the police about</p> <p>3 this incident that you had had with Mr. Rubin?</p> <p>4 A. No.</p> <p>5 Q. Did you ever seek any medical</p> <p>6 attention?</p> <p>7 A. No.</p> <p>8 Q. Your complaint alleges that you</p> <p>9 suffered certain injuries.</p> <p>10 Do you have any -- what injuries did</p> <p>11 you -- well, withdrawn.</p> <p>12 Do you have any photographs of any</p> <p>13 injuries?</p> <p>14 A. Not that I can specifically recall</p> <p>15 at this time.</p> <p>16 Q. Do you recall taking any pictures of</p> <p>17 any injuries at the time?</p> <p>18 A. I don't recall.</p> <p>19 Q. Do you recall what the injuries</p> <p>20 were?</p> <p>21 A. I don't recall exactly.</p> <p>22 Q. Do you recall what part of your body</p> <p>23 the injuries were?</p> <p>24 A. I don't recall.</p> <p>25 Q. Your complaint alleges that you</p>	<p>1 Confidential - █████ Fuller</p> <p>2 Q. Okay. You say, "I did have pictures</p> <p>3 shortly after that time, although I don't know</p> <p>4 in what nature they were."</p> <p>5 Can you tell me, what were they</p> <p>6 pictures of?</p> <p>7 A. I was in Florida. I was hanging out</p> <p>8 by the pool and stuff like that. So selfies</p> <p>9 and whatnot. Other than that I cannot really</p> <p>10 specifics.</p> <p>11 Q. Okay.</p> <p>12 A. Photo taking.</p> <p>13 Q. Okay. But you didn't make a point</p> <p>14 of taking a photograph of a particular injury,</p> <p>15 I take it, is that right?</p> <p>16 A. I can't recall taking specific</p> <p>17 photos, no.</p> <p>18 Q. Do you recall any discussion you had</p> <p>19 with Miss █████ about the incident?</p> <p>20 A. No.</p> <p>21 Q. Did you ever talk with Miss █████</p> <p>22 about the incident?</p> <p>23 A. I believe so.</p> <p>24 Q. When did you come to talk with her</p> <p>25 about the incident?</p>

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